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October 13, 2021

VIA ECF

Hon. Robert W. Lehrburger
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

SO ORDERED:

A handwritten signature in black ink, appearing to be "R. Lehrburger", written over a horizontal line.

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Re: *USA v. Ephraim Joseph Ullman*, Case No.: 1:21-mj-07540-(UA)

Your Honor:

Please take notice that this firm was recently retained and represents Mr. Ullman in this matter. I make this request, out of an abundance of caution, and am respectfully requesting that the Court modify Mr. Ullman's bond conditions to allow him the following:

- (1) Travel to his daughter who at college in the District of Maryland to encompass **overnights**, and
- (2) for an attorney meeting between myself and Mr. Ullmann to take place in the District of Maryland while Mr. Ullmann is visiting his daughter.

This Friday begins a "Parent's Weekend" at Mr. Ullmann's daughter's University in the District of Maryland, with an entire weekend schedule for parents. In light of this, we are requesting that Mr. Ullman be able to stay **overnight** in the District of Maryland between this Thursday night, October 14, 2021 to Sunday night, October 17, 2021. On Monday October 18, 2021, Mr. Ullmann can then return to New York.

**Licensed in California*

***Licensed in New York and California*

****Licensed in New York, SDNY, EDNY, WDNY, 2nd Circuit and DC Federal Court*

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Additionally during such trip, I personally will be in my Maryland residence, and able to have an in-person attorney-client meeting with Mr. Ullmann.

To recap, on August 4, 2021, Mr. Ullman was released in amount of \$ 100,000.00 bond with standard conditions. On August 12, 2021 this Court amended his conditions “to permit him to travel to . . . the District of Maryland and all points between the Southern District of new York and the District of Maryland to permit him to visit his daughter who attends college in Maryland.” (*See* ECF 11, Case Number 1:21-mj-07540-UA).

Again, it is out an abundance of caution that we want to clarify that such visits allow for overnights, and specifically cover the parenting schedule set forth at this college for this Friday and weekend. I also want to ensure that an attorney-client meeting can take place while Mr. Ullman is visiting his daughter in the District of Maryland.

With regards to our instant requests, I have spoken to Pretrial Services who conveyed to me that she does not object to both requests. I also spoke with AUSA Rehn, who consents to both of Mr. Ullmann’s requests.

I thank the Court in advance for your attention and consideration of this request. I can be reached anytime directly at 631.521.1499.

Respectfully Submitted,

/s/

STEVEN A. METCALF, ESQ.

Cc: AUSA Nathan Rehn, Esq. (*via email*)

Karina Chin Vilefort, Pretrial Services (*via email*)

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